

**Coalition Clean Baltic (CCB) consultation response to the Commission's Communication on:
Sustainable fishing in the EU: state of play and orientations for 2027
COM(2026) 271 final and SWD(2026) 145 final - 31 August 2026**

About Coalition Clean Baltic and the scope of this response

Coalition Clean Baltic (CCB) is a politically independent, non-profit network established in 1990 to protect and improve the environment and natural resources of the Baltic Sea region. CCB brings together 26 member organisations and two observer organisations from 11 countries in the Baltic Sea region—Belarus, Denmark, Estonia, Finland, Germany, Latvia, Lithuania, Poland, Russia, Sweden and Ukraine. Together, these organisations represent almost 1.5 million individual members.

This response focuses on the Baltic Sea because it is CCB's geographical area of expertise and because the region illustrates fundamental shortcomings in the current approach to setting fishing opportunities. Although many of the recommendations may also be relevant to other EU sea basins, this submission concentrates on how fishing opportunities should be set to rebuild Baltic fish populations and restore a healthy and resilient Baltic Sea ecosystem.

Introduction

Coalition Clean Baltic (CCB) welcomes the Commission's recognition¹ that declining fishing pressure has not consistently delivered higher biomass, that recruitment and biomass are deteriorating for a number of stocks, and that Baltic fisheries urgently need rebuilding trajectories. These findings must now shape the Council's decision on the 2027 fishing opportunities and the Commission's position during the Council negotiations.

The poor status and decline of many Baltic Sea fish populations have been documented over several decades and show that the ecosystem is in severe distress². Cumulative human pressures have contributed to major ecosystem shifts, and at the same time climate change is making the shallow, semi-enclosed Baltic Sea warmer and less saline. These combined pressures affect not only fish biomass but also recruitment, population age and size structures, species interactions and the functioning of the wider food web³.

Fish populations that once formed the cornerstone of Baltic fisheries are now in critical condition. ICES advises zero catch for eastern and western Baltic cod and western Baltic spring-spawning herring. ICES has advised zero catch for western Baltic spring-spawning herring since 2019 and for eastern Baltic cod since 2020. For western Baltic cod, ICES advised progressively lower catches up to and including 2025, before issuing its first zero-catch advice in May 2025,

¹ European Commission, Sustainable fishing in the EU: state of play and orientations for 2027, COM(2026) 271 final, 5 June 2026, and accompanying SWD(2026) 145 final.

² See for instance the HELCOM HOLAS assessment (HELCOM (2023): State of the Baltic Sea. Third HELCOM holistic assessment 2016–2021. Baltic Sea Environment Proceedings n°194).

³ HELCOM, *State of the Baltic Sea 2023: Third HELCOM Holistic Assessment 2016–2021*, Baltic Sea Environment Proceedings No. 194 (2023), pp. 48–52 and 60–63, <https://stateofthebalticsea.helcom.fi/>

applicable to the fishing years 2026 and 2027. Yet the closure of the targeted western Baltic cod fishery has been in place since 2022, with only a by-catch TAC retained. Despite years of closures and severe restrictions, none has shown sufficient recovery, and the biomass of western Baltic cod has repeatedly been overpredicted⁴. Declining condition and weight-at-age in plaice⁵ provide further signs of ecosystem stress.

Several migratory fish species – many of which remain an important source of income for coastal fishers – are also in trouble. The status of different Baltic salmon populations remains uneven: while some river populations are in better condition, several remain weak and require continued protection and rebuilding efforts⁶. The European eel, which has been listed as Critically Endangered since 2008, has been under zero catch advice since 2021. The eel stock in the Baltic Sea region shows no real sign of recovery despite the actions taken under the EU eel regulation⁷, but exploitation – both commercial and recreational – continues in all Baltic Member States, though catches vary widely.

We note, that the Commission’s CFP evaluation⁸ recognises that progress on stock rebuilding is lacking and that the number of stocks threatened by collapse because of impaired recruitment has increased.

The Baltic crisis reflects the persistent failure to fully implement the CFP and the Baltic MAP, including their precautionary safeguards and the legal obligation to apply ecosystem-based fisheries management (Article 2(3) of the CFP and Article 3(3) of the Baltic MAP). Fishing opportunities for 2027 must therefore mark the first concrete step towards ambitious, time-bound rebuilding trajectories that reduce fishing pressure and enable depleted populations to recover to healthy levels. These trajectories must include implementation of an ecosystem-based approach by accounting for species interactions, food-web needs, habitat conditions,

⁴ We are also concerned about the phenomenon of “phantom recoveries”, where biomass increases for depleted stocks do not materialise as projected, and/or the stock situation in hindsight turns out to be worse than previously assumed. For example, a recent study by Froese *et al.* highlights that indeed the biomass of Western Baltic cod has been repeatedly overpredicted. Froese, R; Steiner, N; Papaioannou, E; MacNeil, L; Reusch, T B H; Scotti, M (2025). Systemic failure of European fisheries management. *Science* 388(6749), pp. 826-828. See figure on p. 827, showing “examples of previous unrealistic estimates and forecasts made by ICES in 2015 and 2018 to 2021”. <https://www.science.org/doi/10.1126/science.adv4341>

⁵ ICES. 2026. Plaice (*Pleuronectes platessa*) in subdivisions 21–32 (Kattegat, Belt Seas, and the Sound). <https://doi.org/10.17895/ices.advice.30932261>

⁶ ICES (2026) Atlantic salmon (*Salmo salar*) in subdivisions 22–31 (Baltic Sea, excluding the Gulf of Finland). In Report of the ICES Advisory Committee, 2026. ICES Advice 2026, sal.27.22-31, 29 May 2026, particularly the advice concerning the protection of weak salmon populations in Assessment Unit 5. <https://doi.org/10.17895/ices.advice.30932375>

⁷ Council Regulation (EC) No 1100/2007 of 18 September 2007 establishing measures for the recovery of the stock of European eel. <http://data.europa.eu/eli/reg/2007/1100/oj>

⁸ European Commission (2026). SWD(2026) 120 final. COMMISSION STAFF WORKING DOCUMENT EVALUATION Regulation (EU) No 1380/2013 of the European Parliament and of the Council of 11 December 2013 on the Common Fisheries Policy. [https://ec.europa.eu/transparency/documents-register/detail?ref=SWD\(2026\)120&lang=en](https://ec.europa.eu/transparency/documents-register/detail?ref=SWD(2026)120&lang=en). 30 April 2026. Referred to as “CFP evaluation report” throughout this document.

environmental and climatic change and scientific uncertainty, while reinforcing, not replacing the CFP's objectives and the Baltic MAP's existing safeguards in Art. 4.6.

1. Fishing opportunities must deliver population rebuilding not merely lower fishing mortality

The communication reports that the median F/FMSY for the assessed Baltic stocks included in the indicator was 39% below FMSY in 2023⁹. However, without context, this aggregated figure can give a misleading impression of the overall condition of Baltic fish populations. This aggregate indicator must not be treated as evidence that Baltic fish populations are healthy. F/FMSY describes exploitation pressure; it does not establish whether biomass is above healthy levels, recruitment is adequate, age and size structures are robust or the food web is functioning. Aggregate trends can also allow improvements in some populations to mask deterioration in others.

The Baltic experience demonstrates that reducing fishing mortality to or below FMSY does not, in itself, ensure population rebuilding and recovery. A depleted population may be fished at or below FMSY while its biomass remains below MSY Btrigger. FMSY is a long-term exploitation reference point calculated under assumptions about stock productivity and biology; it does not specify a rebuilding target or the time within which depleted biomass should recover¹⁰. For central Baltic herring, for example, the ICES FMSY scenario projects median spawning-stock biomass in 2028 at 13% above MSY Btrigger, but still estimates a 36% probability that biomass will be below the trigger that year¹¹. Fishing opportunities must therefore be set at much more precautionary level consistent with a time-bound trajectory to restore and maintain populations above biomass levels capable of producing MSY. These trajectories should take account of recruitment trends, population age and size structure, species interactions, ecosystem functions, environmental conditions, climatic change and scientific uncertainty¹² rather than automatically applying the FMSY point value.

Scientific research reinforces this distinction. Möllmann concludes that conventional single-species reference points have proved insufficient under the deteriorating ecosystem conditions

⁹ European Commission (2026). *Sustainable Fishing in the EU: State of Play and Orientations for 2027*, COM(2026) 271 final, 5 June 2026, pp. 2–3; European Commission, accompanying staff working document, SWD(2026) 145 final, pp. 1–5.

¹⁰ Möllmann, C. (2025). *Fisheries Management in the Baltic Sea: The Shift to Ecosystem Reference Points (ERPs)*, European Parliament, Policy Department for Regional Development, Agriculture and Fisheries, PE 776.022 (November 2025), pp. 5 and 8–9, doi: <https://op.europa.eu/en/publication-detail/-/publication/fc497bba-c42a-11f0-a612-01aa75ed71a1/language-en>

¹¹ ICES (2026). Herring (*Clupea harengus*) in subdivisions 25-29 and 32, excluding the Gulf of Riga (central Baltic Sea). ICES Advice: Recurrent Advice. catch-scenario table, pp. 1–2, Report. <https://doi.org/10.17895/ices.advice.30932081.v1>

¹² Möllmann, *Fisheries Management in the Baltic Sea*, pp. 5, 8–9 and 13–14; Christopher A. Griffiths, Henning Winker, Valerio Bartolino, Håkan Wennhage, Alessandro Orio and Massimiliano Cardinale, 'Including older fish in fisheries management: A new age-based indicator and reference point for exploited fish stocks', *Fish and Fisheries*, 25(1) (2024), pp. 18–37, <https://onlinelibrary.wiley.com/doi/10.1111/faf.12789>

in the Baltic Sea and led to recurrent assessment errors. He argues that ecosystem-level constraints may need to override single-stock advice and require lower fishing pressure¹³.

The Commission should therefore request ICES to accelerate the development and application of operational ecosystem reference points for Baltic fish populations, so that scientific advice reflects food-web requirements, changing environmental conditions and the ecological constraints on population productivity.

Griffiths *et al.*¹⁴ demonstrate why conventional indicators should be complemented by information on population structure. In many species, larger and older fish contribute disproportionately to spawning and stock replenishment and can strengthen population resilience to environmental variation. Of the 72 North-East Atlantic stocks analysed, 45 stocks (62%) had proportionally fewer older fish than expected under equilibrium FMSY conditions. The study also provides an example of a stock with high biomass and fishing mortality below FMSY that nevertheless had fewer older fish than expected under long-term FMSY conditions. These findings indicate that favourable biomass and fishing mortality indicators at a particular point in time do not, on their own, demonstrate full population recovery.

In conclusion, rebuilding trajectories and the scientific advice underpinning fishing opportunities must therefore fully integrate biomass objectives, healthy population age and size structures, food-web functioning and wider ecosystem conditions, rather than treating fishing at or below FMSY as sufficient evidence of population recovery. For more information on the joint NGO position on scientific advice, please refer to the joint briefing series¹⁵.

2. Rebuilding trajectories must be delivered through robust, science-based frameworks

In October 2025, the Commission and eight Baltic Member States committed to seek ICES scenarios for rebuilding Baltic fish populations within different time frames¹⁶. The Commission's proposal and the Council's decision on the 2027 fishing opportunities constitute the first test of that commitment. The Commission should publish what advice has been requested to ICES, which populations it covers and when it will be available. If full rebuilding advice was not available when the Commission prepared its proposal, the Commission should urgently seek and publish special advice presenting alternative catch levels, their projected

¹³ *ibid.*

¹⁴ Christopher A. Griffiths, Henning Winker, Valerio Bartolino, Håkan Wennhage, Alessandro Orio and Massimiliano Cardinale, 'Including older fish in fisheries management: A new age-based indicator and reference point for exploited fish stocks', *Fish and Fisheries*, 25(1) (2024), pp. 18–37, particularly pp. 18–20, 26–27 and 31, doi <https://onlinelibrary.wiley.com/doi/10.1111/faf.12789>

¹⁵ ClientEarth et al., *Briefing Series: Recommendations to the EU and the UK on the Setting of Fishing Opportunities—Briefing 3 of 11: “Best Available” Is Not Good Enough: Addressing Shortcomings in the Current Scientific Advice* (July 2025), pp. 3–8, particularly pp. 6–8, available at: <https://www.clientearth.org/media/wbbf1cg/joint-briefing-series-recommendations-on-fishing-opportunities-briefing-3-addressing-shortcomings-in-the-current-scientific-advice.pdf>

¹⁶ Council of the European Union (2025), [Draft minutes of the Agriculture and Fisheries Council](#), 27–28 October 2025, document 14646/25, p. 13, joint statement on the urgent need for rebuilding fisheries in the Baltic Sea.

effects on biomass and the associated risks, so that this information can inform the October Council.

The principles governing these rebuilding trajectories should build on the BSAC's adopted recommendation for a Baltic rebuilding framework¹⁷. The BSAC recommends that populations should be included automatically in the framework when they fall below MSY Btrigger and that rebuilding should take place within the shortest biologically feasible timeframe, taking account of biological characteristics such as generation time and age at maturity. Consistent with the BSAC recommendation, a fish population should be considered rebuilt only after remaining above MSY Btrigger for at least three consecutive years; because of its different life cycle, salmon should be considered rebuilt after one generation time.

CCB recommends that rebuilding trajectories should aim for healthy and productive biomass above levels capable of producing MSY. These trajectories must complement, not replace, the CFP objectives and the Baltic MAP safeguard requiring the risk of falling below Blim to remain below 5%.

3. Catch uncertainty and non-compliance must be reflected in TAC-setting

The reliability of scientific advice and its ability to inform precautionary and sustainable TAC setting depends on catch data being sufficiently complete and accurate. The joint NGO Briefing Series¹⁸ explains how shortcomings in scientific advice, ecosystem considerations, mixed fisheries and the management of depleted populations must be addressed. Briefing 8 identifies a separate but closely connected problem: fishing opportunities cannot be translated safely from scientific advice when total catches are not fully documented and the resulting fishing mortality is therefore uncertain.

Misreporting and illegal and undocumented discarding are therefore directly relevant to TAC-setting. The Commission reports persistent illegal and undocumented discarding and significant misreporting of landed quantities. It identifies particularly serious shortcomings in Baltic Member States holding the largest quotas and acknowledges that inaccurate catch data undermine both scientific advice and the achievement of CFP objectives¹⁹. Unrecorded discards constitute fishing mortality that is not counted against the relevant quota or fully reflected in catch data, while species misreporting between herring and sprat can distort the species-specific catch data used in assessments and catch forecasts. ICES continues to identify

¹⁷ Baltic Sea Advisory Council, *BSAC Recommendation for Creation of a Rebuilding Framework for Baltic Sea Stocks*, Ref. BSAC 2026-27/4, adopted by the BSAC Executive Committee on 25 June 2026 and issued on 26 June 2026 <https://www.bsac.dk/wp-content/uploads/2026/06/Rebuilding-Advice-BSAC-adopted-by-ExCom-25062026.pdf>

¹⁸ ClientEarth et al., *Joint Briefing Series: Recommendations to the EU and the UK on the Setting of Fishing Opportunities*, 17 July 2025, particularly Briefings 3, 5, 6, 8 and 9, available at <https://www.clientearth.org/latest/press-office/documents/joint-briefing-series-recommendations-to-the-eu-and-the-uk-on-fishing-opportunities/>

¹⁹ European Commission, *Commission Staff Working Document accompanying the Communication "Sustainable fishing in the EU: state of play and orientations for 2027"*, SWD(2026) 145 final, 5 June 2026, pp. 33–34, particularly p. 34. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52026SC0145>

species misreporting of herring and sprat as an ongoing problem and states that, because its effects are only partly incorporated into the assessment, it continues to contribute uncertainty to both the assessment and the advice²⁰.

To address the consequences of poor implementation of the landing obligation, the Commission should explain transparently how non-compliance and incomplete catch documentation have been accounted for in its 2027 proposal. When adopting the fishing opportunities, the Council should set TACs lower than the ICES headline advice by a sufficiently precautionary amount wherever poor compliance creates a risk that actual removals will exceed those assumed in the advice. In the absence of robust and comprehensive control and monitoring, sufficiently precautionary safeguards must be applied through catch accounting to prevent agreed TACs from resulting in fishing mortality beyond sustainable levels. In future proposals, the Commission should systematically incorporate these risks into its TAC calculations.

Quota top-ups should not be applied while compliance with the landing obligation is not effectively monitored and controlled. If top-ups nevertheless continue, appropriate TAC deductions must account for continued discards covered by exemptions. These deductions must be based on robust estimates and should be larger where information on discards is limited or uncertain, in accordance with the precautionary approach. Access to any top-up must be conditional on demonstrated vessel compliance and full catch documentation through Remote Electronic Monitoring with cameras, supported by independent observer coverage where appropriate²¹.

4. Strengthen management and recovery of non-TAC stocks and vulnerable species

While EU recovery and precautionary requirements generally apply to all harvested species, non-TAC stocks are typically unmanaged and often fail to meet policy objectives. Some of these have been exploited unsustainably for many years, including the critically endangered²² European eel. It is imperative that EU objectives such as a precautionary and ecosystem-based approach are applied to all harvested species, whether subject to a TAC or not²³. In some cases, vulnerable target species have been added to the EU prohibited species list, but this is not a consistently applied approach.

²⁰ ICES, *Sprat (Sprattus sprattus) in subdivisions 22–32 (Baltic Sea)*, ICES Advice 2026, spr.27.22–32, 29 May 2026, p. 3, section “Quality of the assessment”.

²¹ ClientEarth et al., *Joint Briefing Series: Recommendations to the EU and the UK on the Setting of Fishing Opportunities – Briefing 8 of 11: Landing Obligation Challenges*, July 2025

²² Pike, C, Crook, V, Gollock, M (2020). *Anguilla anguilla*. The IUCN Red List of Threatened Species 2020: e.T60344A152845178. <https://dx.doi.org/10.2305/IUCN.UK.2020-2.RLTS.T60344A152845178.en>.

²³ ClientEarth et al., *Joint Briefing Series: Recommendations to the EU and the UK on the Setting of Fishing Opportunities – Briefing 10 of 11: Stocks not managed by a Total Allowable Catch*, July 2025.

In its State of Play, the Commission refers to its Marine Action Plan²⁴ in the context of “minimising negative impacts of fishing on the marine environment, its habitats and species”. The Communication, while non-binding, builds on existing commitments and frameworks in fisheries and environment legislation. It emphasises the urgency and importance of improving conservation of critically endangered species that are commercially fished. This category includes several migratory, straddling stocks of which European eel is the most obvious example in the Baltic Sea region, but it should also apply to vulnerable Baltic salmon populations currently without a long-term EU management framework and in some cases species like sea trout and vendace. In addition to halting or limiting fishing, the management and conservation of these migratory species involves tackling a range of human activities. The EU also needs to honour international commitments in managing its vulnerable fish stocks, such as the recently adopted CMS Single Species Action Plan for the European eel (*Anguilla anguilla*)²⁵.

Considering the critically endangered status of European eel, which is also included on the HELCOM Red List for species in the Baltic Sea, it is our view that it should be added to the prohibited species list until a level of recovery that warrants its removal has been documented, halting all targeted fishing, both commercial and recreational. The scientific advice for this stock has been zero catch for all life stages, in all habitats and for all purposes since 2021. ICES explicitly states in its advice that while MSY or precautionary reference points are undefined, “it is considered that the stock size is well below potential biological limit reference points”²⁶. Its recovery also demands urgent measures that address habitat loss and water quality in priority areas, such as the Baltic region, which is documented to produce large mature females of particular importance for population recruitment. If the CFP was fully applied, all targeted fishing for European eel would have to stop. As it stands, the main measure to limit fishing mortality and protect the spawning migration is the annually agreed eel fishing closure in marine waters. This provision has been gradually weakened to include exemptions during the peak migration period, particularly for glass eel fisheries²⁷. While this is not currently utilised in the Baltic region due to a lack of agreement in Baltfish on regionally coordinated closures, the legal language and its application needs significant strengthening in the absence of a complete fishing closure across the EU.

5. Complement recovery-focused TACs with fisheries and habitat restoration measures

Recovery-focused fishing opportunities are indispensable, but annual catch limits must be complemented by fisheries and habitat measures that reduce other sources of fishing mortality

²⁴ European Commission (2023). EU Action Plan: Protecting and restoring marine ecosystems for sustainable and resilient fisheries, p. 6.

²⁵ CMS Single Species Action plan for the European eel (*Anguilla anguilla*). UNEP/CMS/Resolution 15.6: <https://www.cms.int/document/single-species-action-plan-european-eel-anguilla-anguilla>

²⁶ ICES (2025). European eel (*Anguilla anguilla*) throughout its natural range. In Report of the ICES Advisory Committee, 2025. ICES Advice 2025, ele.2737.nea, <https://doi.org/10.17895/ices.advice.27203028>

²⁷ Council Regulation (EU) 2026/249 of 26 January 2026 fixing for 2026, 2027 and 2028 the fishing opportunities for certain fish stocks, applicable in Union waters and, for Union fishing vessels, in certain non-Union waters, and amending Regulation (EU) 2025/202, Art. 14: <http://data.europa.eu/eli/reg/2026/249/oj>

and protect the conditions needed for reproduction and recruitment. Member States must implement complementary and remedial measures, including spatial and seasonal protection of spawning aggregations and mixed-stock areas, such as those of western Baltic spring-spawning herring and North Sea autumn-spawning herring, by-catch avoidance measures and gears, selective low-impact gears, and the protection and restoration of essential spawning and nursery habitats for fish populations (essential fish habitats). Furthermore, Member States must urgently adapt measures to reduce the bycatch of sensitive species and reduce the wider ecosystem impacts of mobile bottom-contacting gears, including physical disturbance of seabed habitats and associated sediment and carbon resuspension. For more detailed recommendations, please read the joint NGO Briefing series Briefing 5, Fishing Opportunities in an Ecosystem Context, and Briefing 6, Mixed Fisheries Considerations²⁸

Fisheries management must also support the achievement and maintenance of Good Environmental Status (GES) under the Marine Strategy Framework Directive (MSFD). This obligation is integral to the CFP: Article 2(5)(j) requires the CFP to be coherent with Union environmental legislation, particularly the objective of achieving GES, while Article 2(3) requires the implementation of ecosystem-based fisheries management. For Baltic fishing opportunities, this means contributing not only to MSFD Descriptor 3, under which commercially exploited fish populations must be within safe biological limits and exhibit an age and size distribution indicative of a healthy population, but also to Descriptor 1 on biodiversity, Descriptor 4 on food webs and Descriptor 6 on seafloor integrity. Fishing opportunities and accompanying fisheries measures must therefore be assessed against their contribution to these objectives, rather than solely against single-stock FMSY reference points.

Fishing opportunities and accompanying fisheries measures must also be coherent with national restoration plans under the Nature Restoration Regulation and with the accelerated implementation of the EU Action Plan for protecting and restoring marine ecosystems, which has so far been insufficiently implemented by Member States.

Member States must urgently address the other human-induced pressures affecting the Baltic Sea ecosystem. These include excessive nutrient and organic inputs from agriculture, wastewater, industry and atmospheric deposition, which contribute to eutrophication and oxygen depletion; hazardous substances and marine litter; climate change; non-indigenous species; underwater noise; and the physical disturbance and loss of seabed and coastal habitats²⁹. Yet fisheries management and habitat restoration cannot restore the Baltic Sea ecosystem on their own unless these pressures are also reduced. Conversely, wider ecosystem pressures must not be invoked to delay reductions in avoidable fishing mortality.

²⁸ <https://www.clientearth.org/latest/press-office/documents/joint-briefing-series-recommendations-to-the-eu-and-the-uk-on-fishing-opportunities/>

²⁹ ICES (2024). Baltic Sea Ecoregion – Ecosystem Overview. ICES Advice: Ecosystem Overviews. Report. <https://doi.org/10.17895/ices.advice.27256635.v1>

6. Socio-economic value and fleet decarbonisation must be reflected in fishing opportunities

First of all, CCB would like to point out that in its communication, the Commission solely focuses on the economic value of fish populations to the fisheries sector. However, healthy and abundant fish populations are not only an economic resource for the commercial fishing sector. They perform essential ecosystem functions and support recreational angling, tourism, coastal communities and wider public benefits. The socio-economic assessment of fishing opportunities must therefore consider the value of recovered fish populations to all parts of society, as well as the long-term viability of commercial fisheries.

CCB welcomes the Commission's recognition that current trends "highlight the importance of stock conservation and of accelerating the energy transition in the EU fishing fleets"³⁰. Rebuilding healthy and abundant fish populations must therefore be treated as an integral part of the fleet's decarbonisation pathway. Healthy, abundant populations reduce fishing time, fishing effort, fuel use and costs. Fleet modernisation and unused capacity margins must not increase effective fishing power or pressure. Article 17 allocation criteria and public finance should instead reward compliance, selectivity, low emissions, low habitat impact and local socio-economic value, with fair access for small-scale coastal fisheries

Recommendations

CCB calls on the European Commission, Member States and fisheries ministers to:

- **Set precautionary and recovery-focused fishing opportunities.** Set TACs at levels corresponding to fishing mortality well below the FMSY point value, or below the ICES headline catch advice, to rebuild depleted populations rapidly and account for weak recruitment, impaired population structure, ecosystem needs and scientific uncertainty.
- **Particular precaution** is required for herring and sprat because their management affects not only the populations themselves but also the availability of prey for cod, salmon, seabirds and other predators. Fishing opportunities must therefore leave sufficient biomass in the ecosystem to support food-web recovery.
- **For the 2027 Baltic fishing opportunities**, the Council should follow the Commission proposals for central Baltic herring, western Baltic spring-spawning herring and eastern and western Baltic cod, while setting lower fishing opportunities for sprat, Bothnian Sea herring, Gulf of Riga herring, plaice, Main Basin salmon and Gulf of Finland salmon, in accordance with the [detailed joint NGO recommendations \(here\)](#). Cod bycatch TACs should be set as close to zero as possible, supported by effective cod-avoidance measures and full catch documentation. [NGO reaction](#) to Commission proposal can be read [here](#).

³⁰ European Commission, *Sustainable fishing in the EU: state of play and orientations for 2027*, COM(2026) 271 final, 5 June 2026

- **Respect existing legal safeguards.** Do not set TACs at levels that breach Article 4(6) of the Baltic MAP, and do not weaken or remove safeguard rules through any possible future MAP review/reform.
- Having previously failed to agree on a multiannual plan for Baltic salmon and in light of the upcoming HELCOM Recommendation on Baltic salmon, **ensure that a consistent framework for salmon management in the Baltic is applied in the future**, protecting vulnerable river populations and enabling re-establishment efforts.
- **Introduce effective management measures for all non-TAC stocks**, fully applying EU objectives such as a precautionary and ecosystem-based approach to all harvested species - see further recommendations in joint NGO briefing ([here](#)).
- **Improve the conservation of critically endangered species that are commercially fished**, especially European eel, which based on its conservation status and the long-standing scientific advice, ought to be added to the EU prohibited species list and not targeted by commercial or recreational fishing until population recovery has been well documented. Management of harvested vulnerable species must also honour international commitments, such as the [CMS Single Species Action Plan for the European eel](#).
- In the absence of a complete eel fishing closure across the EU – in line with CFP objectives and scientific advice – the **provision for the eel fishing closures in marine waters intended to protect migration**, which are agreed on an annual basis, **needs significant strengthening** in order to properly limit fishing mortality at key life stages.
- Ensure that fishing opportunities and accompanying fisheries measures **contribute to achieving and maintaining GES under the MSFD**, including by restoring commercially exploited fish populations to a healthy condition, maintaining biodiversity and food-web functioning, and safeguarding seafloor integrity.
- **Deliver rebuilding advice and plans.** Urgently obtain recurring ICES rebuilding advice for every population below MSY Btrigger and adopt ambitious, time-bound plans that rebuild populations above healthy and productive levels within the shortest biologically feasible timeframe.
- **Account explicitly for uncertainty and unrecorded mortality.** Transparently assess whether scientific uncertainty, recruitment trends, mixed-fishery interactions, ecosystem needs, misreporting, illegal discarding and other sources of unaccounted mortality are fully reflected in the scientific advice and TAC calculations. Where they are not, apply sufficiently precautionary reductions or catch-accounting adjustments to ensure that actual removals remain compatible with population rebuilding.
- **Ensure full catch documentation.** Accelerate risk-based REM and observer coverage, strengthen weighing and species-verification controls, condition quota top-ups on demonstrated compliance and full catch documentation, and apply effective enforcement.
- **Use complementary management measures and restore essential habitats.** Protect spawning aggregations, mixed-stock areas and essential fish habitats; require selective, low-impact and cod-avoidance gears; minimise bycatch; and restore spawning and

nursery habitats. Ensure that fishing opportunities and accompanying fisheries measures are coherent with national restoration plans under the Nature Restoration Regulation and implementation of the EU Action Plan for protecting and restoring marine ecosystems.

- **Align fishing opportunities with climate and nature objectives.** Treat the rebuilding of healthy and abundant fish populations as an integral part of the fleet's decarbonisation pathway. Ensure that fleet modernisation, energy-transition investment and the use of unused capacity margins do not increase effective fishing power or fishing pressure. Use Article 17 allocation criteria and public finance to reward compliance, selectivity, low emissions, low habitat impacts and local socio-economic value, while ensuring fair access for small-scale coastal fisheries.
- **Implement the CFP and Baltic MAP.** Focus on applying and enforcing the existing precautionary and ecosystem-based framework rather than weakening it. It is of utter importance to keep and implement the safeguard contained in Article 4(6) ("the 5% rule"). This provision ***operationalises the precautionary approach established in Article 2(2) of the CFP and provides a clear risk-based framework for avoiding critical stock depletion.***

The Commission's 2027 proposal is now before the Council. The October Council must turn the commitment to rebuild Baltic fish populations into measurable action by adopting fishing opportunities that deliver rapid and sustained recovery. Under no circumstances should the TACs adopted be higher than levels proposed by the European Commission. Fishing opportunities aligned with scientific evidence, legal safeguards and ecosystem needs are the basis for both a recovering Baltic Sea and viable fisheries in the long term.